

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY DALE, BRETT JACKSON,
JOHNNA FOX, BENJAMIN
BORROWMAN, ANN LAMBERT,
ROBERT ANDERSON, and CHAD
HOHENBERY on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

DEUTSCHE TELEKOM AG, and T-
MOBILE US, INC.,

Defendants.

Case No. 1:22-cv-03189

Hon. Thomas M. Durkin

Hon. Jeffrey Cole

JOINT STATUS REPORT

As stipulated in the Parties' May 24, 2024 Joint Status Report (ECF No. 187), Plaintiffs and Defendant T-Mobile US, Inc. ("T-Mobile"), together "the parties," respectfully submit this Joint Status Report proposing interim discovery deadlines. The parties have conferred and now propose the following additional discovery deadlines.

Event	Deadline
Deadline for Plaintiffs to send custodian counterproposal to T-Mobile.	July 1, 2024
Deadline for the Parties to meet and confer regarding Plaintiffs' custodian counterproposal	July 19, 2024
Deadline for Agreeing to Custodians to Use for Each RFP Served Before the Date of This Status Report ¹	August 7, 2024 (except for those RFPs that become the subject of a motion to compel)
Deadline for the Parties to Fulfill Obligations under Paragraph 17 (Document Collection,	4 weeks after the parties agree upon the custodians;

¹ Either party may seek Court intervention to resolve disputes over the T-Mobile custodian list before this date if the parties do not agree on custodians during the meet and confer to occur no later than July 19, 2024.

Search, and Production) of the ESI Protocol (Dkt. 181)	OR
	In the event one of the parties seeks Court intervention regarding custodians, 2 weeks after the Court resolves any such dispute.
Deadline to Agree to a Substantial Completion Deadline for Data Productions	August 16, 2024

The parties respectfully request that the Court enter the foregoing schedule. The parties will make themselves available to discuss further should the Court have any questions.

Dated: June 28, 2024

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CERTIFICATE OF SERVICE

I, Hill Brakefield, an attorney, hereby certify that this Joint Status Report was electronically filed on June 28, 2024, and will be served electronically via the Court's ECF Notice system upon the registered parties of record.

Respectfully submitted,

/s/ Hill Brakefield

Hill Brakefield

*Interim Co-Lead Class Counsel for Plaintiffs and the
Proposed Class*